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Federal Communications Commission
Office of Secretary

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EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98*

Dear Mr. Caton:

SBC Communications Inc., on behalf of itself and its subsidiary, Southwestern Bell Telephone Company ("SWBT"), hereby submits the attached white paper that describes in detail SWBT's activities with respect to the Commission's requirements concerning access to operational support systems ("OSS") features and functions. Please include the attached document in the official record in this rule making docket.

The white paper clearly demonstrates that Southwestern Bell is, without exception, in complete compliance with the Commission's requirements concerning non-discriminatory access to OSS features and functions for pre-ordering, ordering, provisioning, maintenance, repair, and billing. In addition, the paper describes in detail the multiple electronic interfaces and methods that have been developed by SWBT for local service provider ("LSP") requests for resold services or unbundled network elements.

Please feel free to contact me should you have any questions concerning the foregoing.

Very truly yours,

Todd J. Silbergeld

Attachment

cc: Mr. Boasberg   Ms. Keeney   Mr. Gude
     Mr. Coltharp   Mr. Metzger   Mr. Tanner
     Mr. Casserly   Mr. Welch
     Mr. Gonzalez   Mr. C. Brown

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SOUTHWESTERN BELL'S OSS ACCESS ACTIVITIES ARE IN FULL COMPLIANCE WITH ALL OBLIGATIONS

April 1997

I. SOUTHWESTERN BELL'S OSS ACTIVITIES

Under the Federal Communications Commission (FCC) Interconnection Order,[1] the obligations imposed upon Southwestern Bell Telephone Company (Southwestern Bell) regarding access by Competing Local Exchange Carriers (CLECs) to its Operational Support System (OSS) functions distill down to essentially two general requirements.[2] First, Southwestern Bell must have ensured, by January 1, 1997, that CLECs can access existing Southwestern Bell OSS functions on a non-discriminatory basis.[3] Second, Southwestern Bell must negotiate in good faith regarding CLEC-requested forms of OSS access beyond those that exist today, and must implement them when technically feasible and where the CLEC(s) is/are willing to pay the associated costs.[4]

As shown definitively below, Southwestern Bell is, without exception, in complete compliance with both of these requirements. Between the time the Act was signed into law on February 8, 1996, and the FCC issued its First Report and Order on August 8, 1996, Southwestern Bell had already entered into negotiations and reached interconnection agreements with several CLECs. Throughout this process, Southwestern Bell was able to share its plans and receive

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[1] First Report and Order, CC Docket No. 96-98 (FCC 96-325), released August 8, 1996, appeal pending sub nom. Iowa Utilities Board v. FCC, No. 96-3321, et al. (8th Cir.), filed Sept. 5, 1996 (Interconnection Order).

[2] Southwestern Bell and many other companies are challenging aspects of the FCC's OSS requirements. See Iowa Utilities; supra, n. 1.

[3] 47 U.S.C. § 251 (c) (3); Interconnection Order, paras. 523, 525.

[4] 47 U.S.C. §§ 251(c)(1) and (2); Interconnection Order, paras. 278, 314.

feedback from the CLECs on their needs for electronic interfaces. Enhancements were made to the front-end systems with which the CLECs may directly interface. Changes were also made to several "back-office" systems so that orders for resold services and unbundled network elements by CLECs would be fully processed and provisioned. Finally, a number of modifications to OSS software and development of OSS interfaces were made throughout the period from September to December 1996 in order to accommodate expected CLEC competition. Thus, by the time the First Report and Order was issued, Southwestern Bell was well on its way to developing those electronic interfaces which were necessary to provide CLECs with nondiscriminatory access to its OSS functions by January 1, 1997.

Finally, all regulators should realize that some CLECs are attempting to define a standard for OSS compliance by Incumbent Local Exchange Carriers (ILECs) that is impossible to meet, in total contravention of Congressional intent, and flatly inconsistent with the public interest.

II. SOUTHWESTERN BELL IS IN FULL COMPLIANCE WITH THE FCC'S NON-DISCRIMINATORY ACCESS REQUIREMENT REGARDING ITS EXISTING OSS SYSTEMS.

Southwestern Bell is, and has been since January 1, 1997, in complete compliance with the FCC's general requirement that it offer non-discriminatory access to its existing OSS functions for pre-ordering, ordering/provisioning, maintenance, repair and billing by interested CLECs, as outlined in the FCC's Interconnection Order. It is quite clear from the Interconnection Order that the concept of "non-discriminatory access" was intended to mean simply that ILECs need only offer to CLECs the same type of OSS functionality that they themselves utilize today.[5]

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[5] Interconnection Order, paras. 518, 523.

- To facilitate nondiscriminatory access to Southwestern Bell's OSS functions, Southwestern Bell has established a number of support functions and organizations specifically designed to serve CLECs. These support organizations include:

  - the Remote Access Facility ("RAF") and the OSS Help Desk were created, respectively, to provide CLECs with a point of entry for dial-up access or direct access to Southwestern Bell's electronic interfaces, and to answer questions and attempt to resolve problems experienced by the CLECs;

  - the Local Service Provider Service Center ("LSPSC") was created to provide CLECs with a single point of contact within Southwestern Bell for pre-ordering, ordering/provisioning, billing, and collection;

  - the Local Service Provider Center ("LSPC") was created to provide CLECs with a single point of contact for installation, maintenance and repair activities.

- Southwestern Bell offers CLECs the capability to submit service orders manually by facsimile.

- In addition to interfacing with Southwestern Bell manually, Southwestern Bell offers CLECs multiple choices of electronic interfaces for access to its OSS functions depending upon their business needs, transaction volumes, and the information services resources of their company.

- Southwestern Bell will make additional interfaces available if negotiated and provided for in interconnection agreements with individual CLECs.

  The following is a brief description of the choices of electronic interfaces Southwestern Bell makes available to CLECs for each OSS function:

Pre-Ordering

Southwestern Bell offers CLECs a choice of three electronic interfaces, with "real time" access on a dial-up or direct connection basis, to its OSS pre-ordering capabilities:

- Easy Access Sales Environment ("EASE") - On-line systems that were developed as a service order negotiation tool for Southwestern Bell's own retail service representatives, and are currently used by them with both residence and business customers. For resold services, EASE will afford CLECs precisely the same access to pre-ordering capabilities that Southwestern Bell offers to its own retail service representatives;

- Verigate - A Southwestern Bell graphical user interface that offers CLECs access to pre-ordering functions for resold services and unbundled network elements (UNEs).

- DataGate is a Southwestern Bell gateway that was modified to offer an application-to-application electronic interface to pre-ordering functions for resold services and UNEs. SWBT offers this interface to support CLECs which choose to build their own graphic user interface.

Ordering/Provisioning

Southwestern Bell offers CLECs with a choice of electronic interfaces for access to its OSS ordering/provisioning capabilities:

- EASE, as described above for resold services, enables CLECs to perform conversions, new orders, change orders, outside moves and disconnects of residence and most business customers (up to 30 lines).[6] EASE is precisely the same electronic interface

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[6] There currently exists no means to electronically receive and process service requests for resold services of large business customers (i.e., those with over 30 lines) and certain complex serving arrangements (e.g., those that involve trunk groups, Plexar custom, etc.). Southwestern

that Southwestern Bell's own retail service representatives use in pre-ordering and ordering/provisioning service for both residence and business customers.

- Electronic Data Interchange ("EDI") gateway -- is an electronic interface which conforms to Ordering and Billing Forum/Telecommunications Industry Forum ("OBF/TCIF") national standard is available today for joint testing with CLECs. Available to CLECs for ordering both resold services and unbundled network elements, it will enable CLECs to electronically submit Local Service Requests (LSRs) to Southwestern Bell utilizing their own user interface. The EDI gateway will allow CLECs to perform conversions, new connects with straight line listings, changes of service, disconnects, and suspend order requests for resold services. National standards which will provide CLECs with an EDI capability for non-straight line directory listings, partial migrations, and complex service order types are being developed. However, Southwestern Bell is currently developing EDI capabilities for many of these order functions in advance of national standards. Southwestern Bell has agreed to incorporate new national standards into its EDI gateway functionality 120 days after they are developed. For unbundled network elements, national standards are available and Southwestern Bell's interface is now able to support unbundled local loops, interim number portability and switch port activities. Additional functionality will be created as standards become available or as individually negotiated.

Bell's current process for handling these types of service requests for its own retail customers requires extensive manual coordination on the part of Southwestern Bell service representatives. CLECs will also need to contact the LSPSC in order to process such service requests (in the same manner as they are handled for Southwestern Bell customers).

- Southwestern Bell Toolbar - Order Status (formerly known as Customer Network Administration), is a Southwestern Bell-developed graphic user interface which allows CLECs to check on the status of a pending order that has been entered and accepted for processing.

Maintenance and Repair

This function involves the exchange of information which gives CLECs the capability to request repair of resold services and unbundled network elements, and to check on the status of these trouble reports. Southwestern Bell offers CLECs two options to electronically access the functions for reporting trouble, and requesting maintenance and repairs:

- Southwestern Bell Toolbar -- Trouble Administration (TA), is a Southwestern Bell-developed system for trouble administration, maintenance and repair that is currently used by Southwestern Bell retail business customers and interexchange carriers. TA has been enhanced and made available to CLECs so that they may electronically submit and check on the status of trouble reports in the same manner that Southwestern Bell does. In addition, TA has the capability of initiating a mechanized loop test and receiving the test results for resold Plain Old Telephone Service (POTS) lines without initiating a trouble report. TA will also offer trouble history to the CLEC from those POTS lines.

- Electronic Bonding Interface ("EBI"), is the industry standardized electronic interface conforming to American National Standards Institute (ANSI) standards for trouble reporting and obtaining status updates. EBI has been enhanced by Southwestern Bell to enable CLECs to submit trouble reports, receive trouble status updates and closure information.

Billing

Besides paper printouts, Southwestern Bell offers CLECs a choice of four options for obtaining electronic access to end-user account level billing information:

- Bill Plus^{SM} is a diskette (or CD ROM, by 2nd quarter 1997) which offers billing information in an electronic format on a monthly basis. With Bill Plus^{SM}, CLECs can search for information on the bill, and generate standardized or customized reports using data that appears on the bill.

- EDI is an industry standardized electronic format which enables CLECs to receive electronically from Southwestern Bell's Customer Record Information System ("CRIS") database, the same information that would appear on their paper bill for resold services. EDI provides bill data electronically so that CLECs may manipulate data to generate reports to identify intraLATA long distance calls, and export data to their internal systems. For unbundled network elements Southwestern Bell also makes available via its EDI billing interface the ability to receive unbundled network element billing data in an electronic format from its Carrier Access Billing System ("CABS").

- Customer Network Administration (CNA) is available today from Southwestern Bell to give CLECs on-line access to electronically review the same billing information for both resold services and unbundled network elements that would appear on its paper or electronic bills.

- Usage Extract Feed is transmission to CLECs electronically, on a daily basis, of information on the usage billed to its accounts in the industry standardized Exchange Message Record (EMR) format.

The opportunity for access to Southwestern Bell OSS functions through a combination of the functions and interfaces provide CLECs with the information necessary to service their end users in a non-discriminatory manner.[7]

To date, no CLECs are using, on a "live" basis, any of the electronic interfaces Southwestern Bell makes available for pre-ordering, ordering/provisioning, maintenance/repair, and billing. However, AT&T is accessing our EASE system while developing their internal training material and their methods and procedures for their service representatives. In addition, several CLECs have signed contracts that are pending state commission approval to utilize our electronic interfaces. In an effort to stimulate CLEC interest in Southwestern Bell's electronic interfaces, Southwestern Bell has provided demonstrations of its electronic interfaces (e.g., EASE, Trouble Administration, etc.) to several CLECs, including AT&T, MCI and Sprint. In addition, Southwestern Bell has begun offering a one-time, 90-day free access period to its OSS functions. The free access period begins when access is established to any function in a live mode. Southwestern Bell also offers a free 90-day evaluation period whereby Southwestern Bell software applications (e.g., EASE, etc) and existing testing databases are made available, as applicable. The free access period does not apply to tariffed OSS functionality (e.g., Bill Plus[SM]).

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[7] Many CLECs have expressed concerns about the ability of ILECs' electronic interfaces and OSS functions to handle their requirements. Southwestern Bell has requested forecasts of expected transaction/order volumes from several of the larger potential CLECs. To date, no CLEC has provided forecast information with which to accurately develop and plan for increases in OSS capacity. (SWBT has received some such information, of a very limited nature.) Nonetheless, Southwestern Bell is committed to providing sufficient processing capacity to meet the demand of CLECs using any of Southwestern Bell's electronic interfaces. In lieu of forecasts from CLECs, for example, Southwestern Bell has already increased its OSS capacity based upon its own estimates of initial CLEC activity.

Southwestern Bell offers formal training sessions for CLECs who elect to interface with Southwestern Bell electronically. Depending on the chosen application(s), the training is either a requirement or optional to the CLEC. Training is required for applications that impact Southwestern Bell's network (e.g.; EASE and on the Trouble Administration application under the Southwestern Bell Toolbar). These sessions are instructor-led and will include "take-home" documentation with the intention that attendees will in turn train others within their own company. A nominal fee will be charged for all formal training sessions. Some CLECs have already taken advantage of such training sessions and others are scheduled to attend over the next few months.

III. SOUTHWESTERN BELL IS IN FULL COMPLIANCE WITH THE FCC's REQUIREMENT TO NEGOTIATE AND WORK TOWARD IMPLEMENTATION OF NEW FORMS OF REQUESTED OSS ACCESS.

Not only is Southwestern Bell fully compliant with the requirement that it provide non-discriminatory access to its OSS functions, but it also has responded to requests for new forms of access to OSS functions.

While industry standardized interfaces are under development for many OSS functions, Southwestern Bell has attempted to accommodate the needs of CLECs by negotiating the implementation of interim arrangements for a variety of aspects of the electronic interfaces. The important thing to remember is that implementation of these arrangements is complicated and requires cooperation between ILECs and CLECs. It frequently requires extensive mapping between the ILEC and the CLECs, and agreement as to the timing of movement from interim arrangements to emerging industry standards.

Southwestern Bell has an EDI gateway in place that is capable of processing numerous types of orders for both resold services and unbundled network elements. Southwestern Bell has promptly

implemented national standards for electronic interfaces within its OSS functions as they have been developed, and has agreed to implement new national standards within 120 days of their being final.

Southwestern Bell is developing LSR EXchange system (LEX) - a graphical user interface that is based upon national OBF/TCIF standards. It will allow CLECs to electronically create and transmit Local Service Requests (LSRs) to Southwestern Bell, to receive acknowledgments and notification of error details from Southwestern Bell, and to track firm order confirmations and service order completion status of LSRs. LEX is an option for CLECs that do not have the desire or resources to build their own GUI/EDI capability. LEX will be available for use by CLECs in the second quarter of 1997.

Each of these examples demonstrate that Southwestern Bell is actively engaged in implementing new, alternative forms of access to its OSS functions beyond those which are necessary for non-discriminatory access.

IV.   IMPOSING A "WISH LIST" STANDARD OF COMPLIANCE FOR ACCESS TO OSS FUNCTIONS WOULD BY DEFINITION PLACE BOCS IN A PERPETUAL STATE OF NON-COMPLIANCE AND THUS WOULD VIOLATE THE ACT.

It is essential that all regulators, federal and state, recognize that some CLECs are attempting to establish a standard for compliance with the FCC's OSS obligations, which will be literally impossible for the BOCs to comply with. These CLECs argue that, if any BOC is not prepared today to offer whatever new form of OSS functionality access a CLEC claims that it needs, then that BOC is not in compliance with the applicable legal/regulatory OSS access requirements. No such obligation is contained in either the 1996 Act, nor the FCC's orders implementing the Act.

It is beyond debate that the computer/data processing industry is and always has been one of extremely rapid technological development. Indeed, it is not uncommon in this industry for one technology to be virtually obsolesced by a new one just coming off the drawing board before the earlier technology has even been fully deployed.[8] Some CLECs are working to keep the BOCs out of the long distance business as long as possible by urging regulators to adopt an OSS access interface standard based upon this technological phenomenon to ensure perpetual non-compliance by the BOCs.

These CLECs assert that they will "need" the next generation of OSS access method (whether that be Standardized Provisioning, electronic bonding for ordering capability, or whatever) in order to have "a meaningful opportunity to compete" with the BOCs, and that until a BOC has actually delivered such next generation access it should not be deemed in compliance access requirements. Obviously, if a BOC is not deemed to be in compliance until it actually offers the "next" generation of OSS access, it will be in a perpetual state of non-compliance.

Those regulators reviewing forthcoming BOC Section 271 interLATA applications should not be fooled by this disingenuous ploy on the part of some CLECs. Clearly, Congress did not intend the application of such an impossible standard for compliance. Rather, what Congress intended was simply that ILECs provide non-discriminatory access to existing OSS functions, negotiate in good faith newly requested forms of OSS functionality access, and implement them

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[8] For example, Southwestern Bell developed its Business EASE application using OS/2™ because at the time it had the technology advances of allowing multi-tasking and quicker processing. When Windows 95™ and Windows NT™ became available, they included multi-tasking and 32-bit applications for faster processing, as well as offering more user capabilities. Thus, Southwestern Bell is now considering migration to the latest Windows™ environment, weighing the benefits against the conversion costs of moving its business service centers from OS/2 ™.

when they become technically feasible and when the CLECs are willing to pay the ILEC's costs of development and deployment. Thus, as long as an ILEC is negotiating in good faith, and is making a good faith effort in rendering newly requested forms of OSS access available, it is in compliance.

V.   <u>CONCLUSION</u>

Southwestern Bell is in full compliance with the FCC requirement that it provide CLECs with non-discriminatory access to its existing OSS functions, and with the FCC requirement that it negotiate and work toward newer forms of requested OSS function access in good faith. Thus, Southwestern Bell is fully in compliance with the standard for access to ILEC OSS functions contained in the FCC's Interconnection Order.